REMARKS

Applicant appreciates the time taken by the Examiner to review Applicant's present application. Applicant has amended Claims 1, 12, 23, 24 and 26. Applicant respectfully submits that no new matter has been added. Accordingly, Claims 1-24 and 26-32 remain pending in this application. This application has been carefully reviewed in light of the Official Action mailed September 21, 2006. Applicant respectfully requests reconsideration and favorable action in this case.

Rejections under 35 U.S.C. § 102

Claims 1, 5, 8-9, 12, 16, 19-20, 23-24 and 26 stand rejected as anticipated by U.S. Patent No. 6,295,061 ("Park").

Claim 1 as amended recites a method of modifying a target document comprising: accessing a first file comprising code renderable to produce a target document, a second file comprising a metadata element, and a third file comprising a rendering instruction, wherein the code comprises a target element, locating the target element to which the metadata element applies by processing at least a portion of the code of the first file, transforming the metadata element into a rendered element by using the rendering instruction, wherein the rendered element corresponds to the located target element to which the metadata element applies; and displaying the rendered element in conjunction with the target element. Claims 12, 23, 24 and 26 recite similar limitations

Thus, embodiments of the invention allow metadata elements and target elements of a target document to be displayed in the same rendered document displayed by a browser. In certain embodiments this may be accomplished by accessing a target document comprising target elements, a metadata document comprising metadata elements and a document comprising rendering instructions. The target document comprises code (e.g. HTML or other code) which may be rendered to produce a view or page to a user, the code comprising the set of target elements. The metadata document comprises the set of metadata elements, which apply or describe certain types of target elements. The set of rendering instructions describes how a particular type of metadata element should be turned into, or transformed into, a rendered element.

For each of the metadata elements in the metadata document it is determined whether a matching target element can be found in the target document. In certain embodiments, to make these determinations the code of the target document is parsed to obtain the target elements. If a matching target element is found for a metadata element, a rendering instruction which applies to the metadata element is used to produce a rendered element from the metadata element.

This rendered element can then be displayed in conjunction with the target element. In one embodiment, this may be accomplished by inserting the rendered element into the rendered target document during rendering of the target document, or subsequently thereto. Thus, in embodiments of the invention, the rendered element and the target element are displayed in a single rendered document.

The Park reference, in direct contrast, "can create user-friendly and interactive advertising effects...by matching various activities with corresponding image activity control modules." (*See* Park, Col. 10, Lines 40-46) Specifically, Park analyzes the activity of a pointing device to determine if the activity is one of a plurality of predefined activities. Based on the identification of a predefined activity Park executes a matching image activity, where this matching activity includes manipulation of an image in an image file with respect to a cursor. Thus, Park displays and manipulates the image with respect to movements of the pointing device not based on a target document such as an HTML page or the like. (*See* Park, Col. 9, Line 55-Col. 10 Line 25)

Consequently, Park does not process a target document to locate a target element corresponding to the metadata element. Additionally, as the image displayed in Park is a pre-stored image and not a rendered element based on a metadata element Park does not disclose generating a rendered element using the rendering instruction, wherein the rendered element corresponds to the located target element to which a metadata element applies.

For at least these reasons Park does not disclose all the limitations of Claims 1, 12, 23, 24 and 26. Accordingly, withdrawal of the rejection of Claims 1, 12, 23, 24 and 26 and their respective dependent Claims 5, 8-9, 16 and 19-20 is respectfully requested.

Rejections under 35 U.S.C. § 103

Claims 2-4, 6-7, 10-11, 13-15, 17-18 and 21-22 stand rejected as obvious over U.S. Patent No. 6,295,061 ("Park") in view of U.S. Patent No. 6,859,909 ("Lerner"). Claims 27-32 stand rejected as obvious over U.S. Patent No. 6,295,061 ("Park") in view of U.S. Patent No. 7.058,944 ("Sponheim"). Applicant respectfully submits that the above argument presented with respect to Claim 1 apply equally well here. Accordingly, Applicant respectfully requests the withdrawal of the rejection of Claims 2-4, 6-7, 10-11, 13-15, 17-18, 21-22 and 27-32.
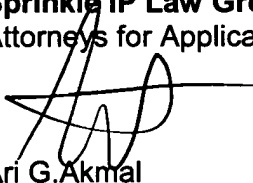
CONCLUSION

Applicant has now made an earnest attempt to place this case in condition for allowance. Other than as explicitly set forth above, this reply does not include an acquiescence to statements, assertions, assumptions, conclusions, or any combination thereof in the Office Action. For the foregoing reasons and for other reasons clearly apparent, Applicant respectfully requests full allowance of Claims . The Examiner is invited to telephone the undersigned at the number listed below for prompt action in the event any issues remain.

The Director of the U.S. Patent and Trademark Office is hereby authorized to charge any additional fees or credit any overpayments to Deposit Account No. 50-3183 of Sprinkle IP Law Group.

Respectfully submitted,

Sprinkle IP Law Group
Attorneys for Applicant

Ari G. Akmal
Reg. No. 51,388

Date: February 20, 2007

1301 W. 25th Street, Suite 408
Austin, TX 78705
Tel. (512) 637-9226
Fax. (512) 371-9088